

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Re:

Order Instituting Rulemaking into the Review of the
California High Cost Fund B Program

Rulemaking 06-06-028

(Filed June 29, 2006)

**REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., dba T-MOBILE (U-3056-C)
REGARDING THE INTERIM OPINION IMPLEMENTING
CALIFORNIA ADVANCED SERVICES FUND**

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Date: December 17, 2007

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Pursuant to the Commission Rule of Practice and Procedure 14, Omnipoint Communications, Inc., dba T-Mobile (“T-Mobile”), respectfully submits the following reply comments:

I. INTRODUCTION

The opening comments filed by the various parties on the Interim Opinion highlight the many factual, legal and practical issues created by the proposed CASF. As expected, no party disputes that broadband plays an increasingly important role in how consumers and businesses choose to communicate. There is, however, simply no basis – and no identifiable need – to provide subsidies to carriers who may want to build out their respective broadband networks.¹ Indeed, there is nothing in the recently filed comments to suggest otherwise. Even those parties that – perhaps not surprisingly - do not seem to object to the concept of such a subsidy raise significant issues with CASF.²

¹ As previously noted, the information compiled to date by the Commission indicates that broadband is widely available in the state and confirms that penetration rates are increasing dramatically every year. See T-Mobile Opening Comments at pp. 3-5 (and Commission broadband reports cited therein); see also AT&T Opening Comments at pp. 5-6 (noting the marked increase in broadband services “without the payment of any of [sic] state broadband subsidies.”).

² See e.g., AT&T Opening Comments at pp. 2-3, 13 (highlighting problems with definition of “unserved” areas and providing subsidies to “underserved” areas; insufficient funding; no basis for connection speeds); CCTA Opening Comments at p. 2 (should not provide subsidies to underserved areas; need to revisit connection speed requirements); Verizon Opening Comments at pp.3-4, 9 (3 Mbps/1Mbps is inappropriate and impractical in light of current technology; insufficient funding).

For purposes of these reply comments, however, T-Mobile will focus on just a few particular issues raised by other parties' comments.

II. REPLY COMMENTS

A. Expanding Funding Eligibility to Affiliates does not Address the Discriminatory Nature of CASF.

Several parties seem to address the discriminatory nature of CASF as set forth in the Interim Opinion.³ To that end, CCTA and Cox suggest that CASF be modified to make the affiliates (presumably broadband and certain wireless affiliates) of CPCN holders eligible to receive subsidies.⁴ Although that suggestion may address the particular problems associated with the CPCN requirement for some providers, it fails to address the fact that there are still unaffiliated communications companies that do not have CPCNs (like T-Mobile and Sprint) providing service to millions of California consumers, and the suggested modification would do nothing to address their apparent exclusion from the proposed CASF.

Moreover, even if the CPCN requirement were modified to address even these most basic concerns about eligibility, CASF is by its very nature discriminatory. For example, as discussed previously, CASF inexplicably provides subsidies exclusively to carriers that can provide bundled broadband/voice communications despite the fact that the Commission has recently deregulated the major ILECs on the basis that voice communications is now a competitive service.⁵ At best, the creation of this new subsidy will significantly distort that voice market.

B. The ILEC Proposals to Fund CASF Should be Rejected

Although their calculations vary slightly, both AT&T and Verizon confirm that the projected CHCF-B revenues (including any surplus as of January 1, 2008) are insufficient to support CASF and

³ See T-Mobile Opening Comments at pp. 10-12; see also CCTA Opening Comments at p. 3 (CPCN requirement precludes many providers); TURN Opening Comments at pp. 5 and 11 (CASF would create two forms of universal service and two versions of basic service).

⁴ See CCTA Opening Comments at p. 3; Cox Opening Comments at p. 10. It is unclear whether the suggestion to make affiliates of CPCNs eligible for CASF implies that the affiliates would be providing voice communications over the broadband connection or whether the CPCN holder would be providing that service over its broadband affiliate's network. The legal and regulatory implications of either would seem to warrant further consideration by the Commission.

⁵ See T-Mobile Opening Comments at p. 12.

CHCF-B.⁶ Thus, even on the most superficial level, the use of those funds to support the deployment of broadband would constitute an unauthorized diversion of CHCF-B surcharges since it would utilize monies that are otherwise needed to fund projected high cost subsidies.

Moreover, the respective ILEC suggestions on how to make up for that “shortfall” should be rejected. For example, AT&T suggests that the initial \$100 million for CASF be funded by increasing the surcharge provided for in D.07-09-020.⁷ However, as discussed more thoroughly in earlier comments, the CHCF-B Fund was specifically created “to establish a fair and equitable *local rate support* structure aided by universal service rate support to telephone corporations serving areas where the cost of providing services exceeds rates charged by providers, as determined by the Commission.”⁸ The surcharge, however, cannot be used (and should not be used) to now provide new subsidies to broadband providers who are also able to provide voice services on their networks.⁹ In fact, the creation of such a subsidy on the heels of the recent reductions to the high-cost fund in D.07-09-020 (which will supposedly reduce subsidies to the ILECs) and the issuance of state video franchise licenses under DIVCA (which will require the buildout of broadband networks by the major ILECs), only tends to cloud the underlying impetus for CASF.

Perhaps more importantly, consumers cannot be – and should not be – required to pay additional surcharges to subsidize a particular technology under the guise of the statutorily sanctioned CHCF-B Fund.

⁶ See AT&T Comments at pp. 13-14 (CHCF-B funding will have a projected \$27 million surplus over two years); see Verizon California Comments at p. 10 (“...PD’s proposed method of funding the \$100 million CASF...will generate insufficient funds...”).

⁷ AT&T Opening Comments at p. 14 (“The amount to be allocated to the CASF needs to be generated by adding to the 0.5% surcredit [surcharge] ordered n D.07-09-020.”).

⁸ Pub. Util. Code § 739.3(c).

⁹ If a carrier desires to provide voice services in so-called high cost areas – regardless of whether they provide those services over landline, wireless, broadband, satellite or whatever other technology is available - they should be able to participate in the CHCF-B Fund provided that they are the most efficient provider of voice communications in that area. However, it would be inappropriate to allow broadband providers in particular to now bootstrap their way into the fund by virtue of the fact that they can also provide voice communications over their particular platform. See *Pub. Util. Code* § 270(b) (the CHCF-B funds “are held in trust for the benefit of ratepayers and to compensate telephone corporations for their costs of providing *universal service*.”) (emphasis added); see also *id.* at § 270 (c).

To determine otherwise would, among other things, constitute an improper assessment on consumers and run counter to the Commission's goal of reducing consumer surcharges "without undue delay".¹⁰

Verizon seems to support the idea that the CHCF-B surcharge should not be increased to fund CASF.¹¹ Instead, it seems to suggest that the CASF funds be drawn from the CHCF-B, only over a longer period of time.¹² Leaving aside the issue of whether the revenues generated from the 0.5% surcharge over this protracted time period will be sufficient to support high cost subsidies as well as broadband deployment subsidies,¹³ the suggestion is replete with problems. Among other things, it (a) ignores that there is not authorization to use these funds for broadband deployment; (b) disregards the fact that future CHCF-B claims are difficult if not impossible to predict given that the scope of high cost areas as well as potential claims under a reverse auction are unknowns and (c) seems to assume that the Interim Opinion caps CASF at \$100 million indefinitely.

C. Minimum Connection Speeds Highlight Some of the Fundamental Problems with CASF

Practically every party challenged the Interim Opinion's selection of a minimum 3 Mbps/1Mbps connection speeds for evaluating CASF applications.¹⁴ According to the parties, these speeds are

¹⁰ See D. 07-09-020 at pp. 75-76; see also, T-Mobile September 26, 2007 Comments at p. 11 (consumers should enjoy the benefits of the revised CHCF-B fund).

¹¹ See Verizon California Comments at p. 10.

¹² See *id.* at p. 10 ("Rather than increasing the surcharge to fund both the B-Fund and CASF, the Commission should allow of collection of CASF fund over three or four years.").

¹³ With the 0.5% surcharge, the fund is projected to generate annual revenues of approximately \$114 million while projected high cost claims as of July 1, 2009 are estimated by the Commission to be \$108 million (\$8.994 million/month x 12 months). Thus, it is difficult to see how there is any "surplus" for CASF even if the time frame is extended. T-Mobile acknowledges, however, that AT&T asserts that its claims on the high cost fund will be significantly less than projected by the Commission. See AT&T November 28, 2007 Reply Comments, p. 2, n.12. T-Mobile has no comment on AT&T's assertions at this time other than to note that (a) even if AT&T is correct, it appears that the CHCF-B claims will be more in the range of \$54 million (i.e., \$(8.9994-4.5) million/month x 12 months) and (b) it seems difficult to estimate the projected high cost claims at this stage in that proceeding. See discussion in text above.

¹⁴ See e.g., AT&T Comments at pp. 5-8 (no consideration of why those speeds are necessary, improper evidence and factual support for telecommuting claim); CCTA Comments at pp. 2-3 (at a minimum, need to revisit speed requirement for underserved areas); Sprint Comments at p. 6 (no evidence to support speeds for telecommuting); Verizon Comments at pp. 3-4 (Verizon's FiOS service meets the standards but proposed speeds are not technologically neutral or reflective of commonly provided services currently used by consumers.)

unrelated to the connection speeds currently available to consumers. Thus, depending on which comments are being considered, the proposed connection speeds are either overly exclusive, overly inclusive, discriminatory or simply inadequate.¹⁵ In any event, the discussion over connection speeds highlights the fact that the broadband market is not fully understood by the Commission at this time and that the establishment of a subsidy to support deployment does not constitute sound public policy.

III. CONCLUSION

For the reasons set forth above, and in its opening comments, T-Mobile respectfully suggests that the Commission resist the temptation to address broadband issues through the establishment of the CASF. To the extent regulatory intervention is ultimately warranted in this area, it is entirely unclear whether that intervention should take the form of a consumer-funded subsidy. In any event, the creation of such a subsidy at this time is, at best, inappropriate and premature.

Respectfully submitted this 17th day of December, 2007 at San Francisco, California.

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By /s/
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¹⁵ See e.g., AT&T Opening Comments at p. 8 (speeds currently offered meet the needs of most broadband users); Sprint Opening Comments at p. 5 (“The unfortunate appearance is that, by setting upstream speed at 1 MBPS, the PD wanted to make as much of California eligible for CASF subsidies for AT&T and Verizon as possible.”); T-Mobile Opening Comments at p. 12 (no industry standards exist); TURN Opening Comments at p. 10 (set benchmark data speeds at 10 Mbps).

CERTIFICATE OF SERVICE

I, Richard M. Marshall, certify that the following is true and correct:

I am employed in the City of Oakland, County of Alameda, California, am over the age of eighteen years, and am not a party to the within entitled cause. My business address is 1901 Harrison Street, Suite 1620, Oakland, CA 94612.

On December 17, 2007, I served a copy of:

**REPLY COMMENTS OF OMNIPOINT COMMUNICATIONS, INC., dba T-MOBILE (U-3056-C)
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attached hereto, on all parties to the attached service list for R.06-06-028 by sending copies via U.S. Mail and/or electronic copies via email.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on December 17, 2007 at Oakland, California.

/s/

Richard M. Marshall

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